

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS, INDIANA**

CHRISTY YORK)	
)	
Plaintiff,)	
)	
v.)	CAUSE NO. 1:23-cv-01091
)	
SPEEDWAY, LLC)	
Defendant,)	

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, name-above, complains of act and omissions by the Defendant. In support of her Complaint and as cause of action against the Defendant, Plaintiff respectfully submits the following:

JURISDICTION

1. This suit is authorized and instituted pursuant to Equal Pay Act 29 U.S.C. Sec. 206(d).

PARTIES

2. Plaintiff is woman and at all relevant times she resided in the Southern District of Indiana.

3. Defendant is a corporation doing business in the State of Indiana in the Southern District of Indiana.

FACTS

4. Plaintiff was hired by Speedway LLC as a part-time employee in 2001.

5. Plaintiff performed her job well.

6. Plaintiff was promoted numerous times, and finally was promoted to the position of District Manager.

7. As a District Manager, Plaintiff was paid less than other male District Managers even though both of their positions required equal skill, effort, responsibility and they worked under similar working conditions at Defendant.

8. On June 22, 2021, Plaintiff ended her employment with Defendant due to Defendant's discriminatory actions.

9. Plaintiff was paid less due to her gender.

COUNT I

10. Plaintiff incorporates by reference paragraphs 1-9.

11. Defendant, as a result of failing to pay Plaintiff due to his gender, violated the Equal Pay Act 29 U.S.C. Sec. 206(d).

WHEREFORE, Plaintiff respectfully requests that the Court grant the following relief:

- A. Award Plaintiff back pay and benefits lost;
- B. Award Plaintiff punitive damages;
- C. Award Plaintiff liquidated damages;
- D. Award Plaintiff his cost in this action and reasonable attorney fees;
- E. Grant Plaintiff any other relief which is allowable under the circumstances of this case.

Respectfully Submitted

s//Amber K. Boyd

Amber K. Boyd 31235-49
Attorney for Plaintiff

REQUEST FOR JURY TRIAL

Comes now the Plaintiff and requests that this cause be tried by a jury.

Respectfully Submitted

s//Amber K. Boyd

Amber K. Boyd 31235-49
Attorney for Plaintiff

Amber K. Boyd 31235-49
Amber K. Boyd Attorney at Law
8510 Evergreen Avenue
Indianapolis, in 46240
(317) 960-5070